

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF WISCONSIN

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In re:

JENNIFER McKINNEY AND  
ISRAEL McKINNEY

Case No. 22-11558  
Chapter 13  
Hon. Rachel M Blise

Debtors.

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**UNITED STATES' RESPONSE TO DEBTORS' MOTION FOR CONTINUANCE OF  
AUTOMATIC STAY PURSUANT TO BANKRUPTCY CODE SECTION 362(C)(3)**

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The United States of America, on behalf of the Internal Revenue Service (IRS), does not oppose Debtors' motion to continue the stay, provided that the granting of such motion is without prejudice to any motion for relief from the automatic stay filed by the IRS (including the motion pending with this Court in ECF 10).

Dated this 13th day of October, 2022.

Respectfully Submitted,

TIMOTHY M. O'SHEA  
United States Attorney

By:

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